



Oregon

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file Crawford

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7/13/01

September 13, 2001

Also sent by e-mail

Matt Cusma
Schnitzer Steel Industries
P.O. Box 10047
Portland, Oregon 97296-0047

RE: Black Sand Removal Work Plan
Crawford Street Corporation Site
8424 and 8524 N. Crawford Street, Portland, Oregon

Dear Mr. Cusma:

Thank you for submitting the August 28, 2001 *Black Sand Removal Action Work Plan* as part of the Expanded Preliminary Assessment (XPA) of the above-referenced site. The Department of Environmental Quality (DEQ) reviewed the document and has the following comments.

Section 1.2.2/Table 1-2 The lower of either MacDonald TECs or NOAA TELs should be used for ecological screening.

Section 2.2.5.

- Baseline sampling of surface soils should be performed prior to the placement of the plastic liner. Sampling should also be performed following removal of the stockpile and liner to demonstrate the on-site management did not result in a release of hazardous substances.
- The work plan should indicate that a hazardous waste determination will be performed on the black sand stockpiled on-site in accordance with OAR 340-102-011, 40 CFR 261, and US EPA SW-846 Test Methods for Evaluating Solid Waste. Sampling procedures and analytical methods should be presented in the work plan. One discrete sample per 50 cubic yards soil is reasonable for such characterization, and the sampling should be conducted within seven days after the excavated soil is stockpiled.
- The final disposition of the black sand material should be implemented within 90 days of stockpiling. The work plan should discuss options for the final disposition of the black sand material, including potential applicability of RCRA Land Disposal Restrictions.

Section 2.2.6. Analysis of post-excavation confirmation samples should include total petroleum hydrocarbons and mercury.

Section 3.3. The report should include the "Hazardous Waste Determination" for the black sand. Documentation of the disposal of the black sand (e.g., manifests) and closure of the waste pile should be submitted for DEQ review and approval.

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Mr. Matt Cusma
September 13, 2001
Page 2 of 2

Section 5. The schedule should include a target date or specific time period (i.e., 45 days following completion of the removal) when the removal report will be submitted. The schedule should include removal of the black sand stockpile.

Please respond to these comments by letter within 30 days of receipt or prior to commencing field activities (whichever is sooner); it is not necessary to re-submit the work plan. Please call me if you have questions.

Sincerely,

Tom Gainer, P.E.
Project Manager
Voluntary Cleanup/Portland Harbor

cc: Ross Rieke, Bridgewater Group
Rod Struck, DEQ/NWR
Eric Blischke, DEQ/NWR